UNITED STATES DISTRICT COURT FEB 2 8 2017 SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA	<b>§</b> §	
v.	§ § Criminal No.	M-17-291
RAYMOND GONZALES	§	" 11 47
ROBERT GONZALES	<b>§</b>	

## **SEALED INDICTMENT**

#### THE GRAND JURY CHARGES:

# **Count One**

On or about January 10, 2015, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

#### **RAYMOND GONZALES**

knowingly made a false statement and representation with respect to information required to be kept in the records of Danny's Pawn & Sporting Goods, in McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of two Century Arms, Model PAP-70, 7.62x39mm caliber rifle, in that the defendant, RAYMOND GONZALES, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that RAYMOND GONZALES was the actual buyer of the firearm described above, when in truth and fact the defendant knew that those statements and representations were false and that defendant, RAYMOND GONZALES, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

## **Count Two**

On or about December 19, 2014, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

# ROBERT GONZALES and RAYMOND GONZALES

knowingly made and caused to be made a false statement and representation with respect to information required to be kept in the records of Shooting Academy of South Texas, in McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century Arms, Model WASR-10, 7.62x39mm caliber rifle and a PTR, Model PTR-91, .308 caliber rifle in that the defendant, ROBERT GONZALES, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that ROBERT GONZALES was the actual buyer of the firearm described above, when in truth and fact the defendant knew that those statements and representations were false and that defendant, ROBERT GONZALES, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

A TRUE BILL

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KENNETH MAGIDSON UNITED STATES ATTORNEY

ASSISTANT UMITED STATES ATTORNEY